

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Application of Benjamin Steinmetz for
an Order to Take Discovery from Vale S.A.,
Vale Americas Inc., Rio Tinto Plc, and Rio
Tinto Limited pursuant to 28 U.S.C. § 1782

Case No. 20-mc-212-AJN

**NOTICE OF CONDITIONAL CROSS-APPLICATION TO
COMPEL RECIPROCAL DISCOVERY PURSUANT TO 28 U.S.C. § 1782**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law and Declaration of Jeffrey Rosenthal and all exhibits thereto, Respondent Vale S.A. (“Respondent”) will move in the United States District Court for the Southern District of New York, before the Honorable Alison J. Nathan, United States District Judge, for a conditional order compelling Benjamin Steinmetz, Petitioner, to comply with Respondents’ requests for reciprocal discovery pursuant to 28 U.S.C. § 1782, and for such other relief as this Court deems just and proper.

Dated: June 26, 2020
New York, New York

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